

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SIMPSON VENTURES, INC.,

Plaintiff,

v.

**MIDWEST METAL PRODUCTS
COMPANY, INC.,**

Defendant.

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Case No. 3:07-CV-048-WHA

PLAINTIFF'S ANSWER TO COUNTERCLAIM

COMES NOW Simpson Ventures, Inc. (hereinafter "SIMPSON"), the Plaintiff herein, and by and through its undersigned attorneys, files this Answer to the Counterclaim of Defendant Midwest Metal Products Company, Inc.

INTRODUCTION

Mid-West Metals' Counterclaim at its outset purports to incorporate the numerous responses and defenses raised by Mid-West Metal in its Answer to somehow be part of a counterclaim, but does not point out with any clarity which parts of its responses and defenses are intended to be part of an actual counterclaim. Accordingly, this initial paragraph purporting to incorporate by reference is so unclear that Plaintiff Simpson cannot ascertain the substance of this purported portion of the counterclaim and is therefore denied. With regard to the numbered paragraphs of Mid-West Metals' Counterclaim, Plaintiff Simpson responds as follows:

1. Admitted.
2. Admitted.

3. Admitted.

4. Admitted that Jeffrey Simpson is the inventor of the design depicted in United States Design Patent No. Des. 534,321 and that Jeffrey Simpson has licensed certain rights therein to Simpson Ventures.

5. Admitted.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted.

10. Denied.

/s/ Robert T. Meadows, III

Robert T. Meadows, III

ALABAMA BAR NO. MEA012

One of the Attorneys for Plaintiff Simpson
Ventures, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I have served an exact copy of the above and foregoing by placing the same in the United States mail, postage prepaid, properly addressed, this the 3rd day of July, 2007, upon the following:

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